

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Misc. No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF VENEZUELA,)	
)	
Defendant.)	

**SPECIAL MASTER’S MOTION
FOR AUTHORIZATION TO LAUNCH THE MARKETING PROCESS**

Special Master Robert B. Pincus (the “Special Master”) respectfully requests entry of an Order, pursuant to paragraph 5 of the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (the “Sale Procedures Order”) [D.I. 481], authorizing the launch of the Marketing Process¹ on October 23, 2023.²

In support of the requested relief, the Special Master states as follows:

1. The Court entered the Sale Procedures Order on October 11, 2022, pursuant to which the Court held, among other things:

The Initial Status Conference shall be held approximately 30 days after the Preparation Launch Date at a date and time to be set by the Court by separate order (the “Initial Status Conference”). At the Initial Status Conference, the Special Master shall provide the Court and interested parties with an update on his progress and the Special Master’s current estimate, if any, regarding launch of the Marketing Process. For the avoidance of doubt, the Special Master shall not launch the

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Sale Procedures Order.

² Separately, the Special Master intends to file a status report prior to the Launch Date regarding his progress and to update the Court and interested parties on the Marketing Process.

Marketing Process until otherwise ordered by the Court.

Sale Procedures Order, ¶ 5.

2. On July 17, 2023, after consideration of the *Special Master's Supplemental Report and Recommendation Pursuant to the Sale Procedures Order* [D.I. 533], the responses of the Sale Process Parties [D.I. 561, 562, 582, 584], and the Special Master's reply [D.I. 583], the Court set the Preparation Launch Date for July 24, 2023, and the Launch Date for October 23, 2023. *See* D.I. 643.

3. The Initial Status Conference was held on September 12, 2023, during which the Special Master provided the Court and interested parties with an update on his and his Advisors' activities since the Preparation Launch Date, including review of information and documents provided by CITGO in response to diligence requests, and preparation of a confidential information memorandum and other marketing materials.

4. Since the Initial Status Conference, the Special Master and his Advisors have continued to make progress on preparation of marketing materials. As such, the Special Master hereby represents that he currently expects to be ready to launch the Marketing Process on October 23, 2023, as previously contemplated by the Court and without any further delay.

CONCLUSION

For the reasons articulated above, the Special Master requests that the Court enter an Order authorizing the launch of the Marketing Process on October 23, 2023.

POTTER ANDERSON & CORROON LLP

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Dated: October 11, 2023

/s/ Myron T. Steele

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[PROPOSED] ORDER

WHEREAS, the Special Master filed his Motion for Authorization to Launch the Marketing Process on October 23, 2023;

IT IS HEREBY ORDERED this ____ day of October 2023 that the Special Master's Motion is GRANTED.

HONORABLE LEONARD P. STARK
UNITED STATES DISTRICT COURT